

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

_____)	
ANDRE BISASOR,)	
Plaintiff,)	
)	
vs.)	
)	
CRAIG S. DONAIS, RUSSELL F.)	Case No. 1:25-cv-00251-SE-AJ
HILLIARD, DONAIS LAW OFFICES)	
PLLC, and MARY K. DONAIS,)	
Defendants.)	
_____)	

DEFENDANT RUSSELL F. HILLIARD'S MOTION TO DISMISS

Defendant Russell F. Hilliard, by his attorneys, Preti Flaherty Beliveau & Pachios, LLP, respectfully submits the within Motion to Dismiss, and in support thereof, represents as follows:

1. Plaintiff's Complaint alleges causes of action against Mr. Hilliard purporting to sound in Defamation (Count IV), Aiding and Abetting Defamation (Count VIII), Abuse of Judicial and Administrative Process (Count XI), Tortious Interference with Advantageous Relations (Count XII), Intentional Infliction of Emotional Distress (Count XIII), and Civil Conspiracy (Count XIV).
2. All of Plaintiff's claims are barred by the statute of limitations. Moreover, Mr. Hilliard's actions are protected by the absolute legal privilege. Even if the privilege does not apply, the Complaint fails to state a claim upon which relief may be granted against Mr. Hilliard on any of the counts directed at him.
3. A Memorandum of Law in support of this Motion to Dismiss is submitted herewith.

WHEREFORE, for the reasons set forth above and in the accompanying Memorandum of Law submitted herewith, Defendant Russell F. Hilliard respectfully requests this Honorable Court to:

- A. Grant this Motion to Dismiss;
- B. Dismiss all of Plaintiff's claims against Defendant Russell F. Hilliard with prejudice and enter judgment in his favor;
- C. Award reasonable attorney's fees and costs; and
- D. Grant such other relief as may be just and proper.

Respectfully submitted,
The Defendant,
RUSSELL F. HILLIARD,
By his attorneys,

/s/ Daniel R. Sonneborn

Daniel R. Sonneborn, NH Bar #20947

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Dated: July 10, 2025

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of this document to be served via electronic filing on all counsel of record on July 10, 2025 and will be served on Plaintiff, Andre Bisasor by first-class mail and electronic mail as follows:

Andre Bisasor, Pro Se
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Attleboro, MA 02703
quickquantum@aol.com

/s/ Daniel R. Sonneborn

Daniel R. Sonneborn